

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF TEXAS

VICTORIA DIVISION

Clerk, U.S. District Court  
Southern District of Texas  
FILED

APR 12 2017

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA

v.

LETICIA GALLARZO

AKA LETICIA GARZA GALLARZO

AKA LETICIA GALINDO

GALLARZO

AKA ODONTUYA LETICIA

GALLARZO PUREVSANGA

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CRIMINAL NUMBER

V-17-29

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

From or about March 15, 2015, until on or about October 23, 2015, in the Victoria Division of the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

LETICIA GALLARZO  
AKA LETICIA GARZA GALLARZO  
AKA LETICIA GALINDO GALLARZO  
AKA ODONTUYA LETICIA GALLARZO PUREVSANGA,

did knowingly transfer, possess, and use, without lawful authority, a means of identification of another, to wit: Registered Nurse License number 686038, during and in relation to a felony violation of Title 18, United States Code, Section 1035.

In violation of Title 18, United States Code, Section 1028A.

COUNT TWO

From on or about March 15, 2015, and continuing until on or about April 30, 2015, in the Victoria Division of the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

LETICIA GALLARZO  
AKA LETICIA GARZA GALLARZO  
AKA LETICIA GALINDO GALLARZO  
AKA ODONTUYA LETICIA GALLARZO PUREVSANGA,

did knowingly and willfully make materially false, fictitious, or fraudulent statements or representations in connection with the delivery of or payment for health care benefits, items, or services, that is, she falsely represented herself to be a registered nurse while delivering health care services under a health care benefit program as defined by Title 18, United States Code, Section 24(b), at La Bahia Nursing and Rehabilitation knowing that she was not, in fact, a registered nurse.

In violation of Title 18, United States Code, Section 1035(a)(2).

COUNT THREE

From on or about May 5, 2015, and continuing until on or about May 9, 2015, in the Victoria Division of the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

LETICIA GALLARZO  
AKA LETICIA GARZA GALLARZO  
AKA LETICIA GALINDO GALLARZO  
AKA ODONTUYA LETICIA GALLARZO PUREVSANGA,

did knowingly and willfully make materially false, fictitious, or fraudulent statements or representations in connection with the delivery of or payment for health care benefits, items, or

services, that is, she falsely represented herself to be a registered nurse while delivering health care services under a health care benefit program as defined by Title 18, United States Code, Section 24(b), at Palacios Community Hospital knowing that she was not, in fact, a registered nurse.

In violation of Title 18, United States Code, Section 1035(a)(2).

COUNT FOUR

From on or about May 5, 2015, and continuing until on or about May 10, 2015, in the Victoria Division of the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

LETICIA GALLARZO  
AKA LETICIA GARZA GALLARZO  
AKA LETICIA GALINDO GALLARZO  
AKA ODONTUYA LETICIA GALLARZO PUREVSANGA,

did knowingly and willfully make materially false, fictitious, or fraudulent statements or representations in connection with the delivery of or payment for health care benefits, items, or services, that is, she falsely represented herself to be a registered nurse while delivering health care services under a health care benefit program as defined by Title 18, United States Code, Section 24(b), at Yoakum Community Hospital knowing that she was not, in fact, a registered nurse.

In violation of Title 18, United States Code, Section 1035.

COUNT FIVE

From on or about May 13, 2015, and continuing until on or about September 23, 2015, in the Victoria Division of the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

LETICIA GALLARZO  
AKA LETICIA GARZA GALLARZO  
AKA LETICIA GALINDO GALLARZO  
AKA ODONTUYA LETICIA GALLARZO PUREVSANGA,

did knowingly and willfully make materially false, fictitious, or fraudulent statements or representations in connection with the delivery of or payment for health care benefits, items, or services, that is, she falsely represented herself to be a registered nurse while delivering health care services under a health care benefit program as defined by Title 18, United States Code, Section 24(b), at Yorktown Nursing and Rehabilitation Center knowing that she was not, in fact, a registered nurse.

In violation of Title 18, United States Code, Section 1035(a)(2).

COUNT SIX

From on or about September 22, 2015, and continuing until on or about October 23, 2015, in the Victoria Division of the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

LETICIA GALLARZO  
AKA LETICIA GARZA GALLARZO  
AKA LETICIA GALINDO GALLARZO  
AKA ODONTUYA LETICIA GALLARZO PUREVSANGA,

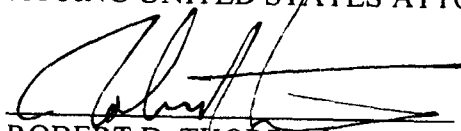
did knowingly and willfully make materially false, fictitious, or fraudulent statements or representations in connection with the delivery of or payment for health care benefits, items, or services, that is, she falsely represented herself to be a registered nurse while delivering health care services under a health care benefit program as defined by Title 18, United States Code, Section 24(b), at Twin Pines North Nursing and Rehabilitation Center knowing that she was not, in fact, a registered nurse.

In violation of Title 18, United States Code, Section 1035(a)(2).

A TRUE BILL:  
ORIGINAL SIGNATURE ON FILE  
FOREPERSON OF THE GRAND JURY

ABE MARTINEZ  
ACTING UNITED STATES ATTORNEY

By:

A handwritten signature in black ink, appearing to read "Robert D. Thorpe, Jr.", is written over a horizontal line.

ROBERT D. THORPE, JR.  
Assistant United States Attorney